

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Advanced Television Systems)	
and Their Impact upon the)	MB Docket No. 87-268
Existing Television Broadcast)	
Service)	
)	

COMMENTS OF TWIN CITIES PUBLIC TELEVISION, INC.

Twin Cities Public Television, Inc., licensee of noncommercial educational television Stations KTCA-TV/DT and KTCI-TV/DT, St. Paul, Minnesota ("TPT"), hereby submits these Comments pursuant to paragraph 16 of the Commission's *Seventh Further Notice of Proposed Rule Making* ("*Seventh Further Notice*")¹ in the above-captioned proceeding. These Comments correct certain data concerning Stations KTCA-DT and KTCI-DT contained in Exhibit B to the *Notice* and seek clarification as to TPT's ability to modify the facilities of Station KTCI-DT when it commences operations on its permanent DTV channel. The corrections for each station are set forth below.

Station KTCA-DT: Exhibit B indicates that Station KTCA-DT will operate on DTV Channel 34 with an ERP of 1000 kW at a HAAT of 399 meters using an antenna with an Antenna ID of 74786. The information as to Station KTCA-DT's ERP and HAAT is incorrect,

¹ *In re Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MM Docket No. 87-268, Seventh Further Notice of Proposed Rule Making, FCC 06-150, (rel. Oct. 20, 2006).

and the antenna listed in Exhibit B is different than the antenna TPT will deploy after the transition and has a different antenna pattern.

As the enclosed copy of Station KTCA-DT's license indicates, the station is currently authorized to operate on Channel 34 with an ERP of 662 kW at a HAAT of 411.1 meters.² While TPT originally indicated in its FCC Form 381 that it intended to operate Station KTCA-DT with DTV facilities that replicated its initial DTV allotment, it notified the Commission by e-mail on November 5, 2004, one day after filing its Form 381, that it would operate with an ERP of 700 kW, rather than 1000 kW, as originally assigned in the Commission's *Sixth Report and Order* in this proceeding.³ A copy of that e-mail is attached as Exhibit 2. TPT subsequently sought and obtained a construction permit to reduce Station KTCA-DT's ERP further to 662 kW. (FCC File Nos. BMPEDT-20060718ACE) As the attached license indicates, the station has been licensed at that power. (FCC File No. BLEDT-20060802AGD).

In its Form 381, TPT advised the Commission that some of the data concerning Station KTCA-DT's antenna site was incorrect and stated that it would file an application to correct that information once the survey required to verify the data was completed. The application to correct the Commission's database was filed on March 22, 2005 (FCC File No. BMPEDT-20050322AGE) and was granted on April 22, 2005. That application corrected the elevation of Station KTCA-DT's antenna to 413.8 m AGL, 690.8 m AMSL, and 411.1 m HAAT. Accordingly, TPT requests that the Commission correct Exhibit B to reflect that the ERP for Station KTCA-DT is 662 kW and that its HAAT is 411.1 meters.

² See Exhibit 1.

³ *In re Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MM Docket. No 87-268, Sixth Report and Order, 12 FCC Rcd. 14599 (1997).

TPT also notes that the antenna pattern for the antenna listed in Exhibit B, 74876, does not correspond to the antenna pattern of the antenna TPT is currently using and plans to continue using after the end of the transition. TPT plans to use the same panel antenna for Station KTCA-DT and for Station KTCI-DT after the transition. That antenna is currently used by Station KMSP-DT and Station KTCA-DT. The pattern for 74876 is omnidirectional, whereas the DIE TUP-SP4-12S-1 antenna used by Station KTCA-DT is a directional antenna, as indicated in the attached Exhibit 3. Accordingly, TPT requests that the Commission amend Exhibit B to specify the correct antenna for Station KTCA-DT.⁴

Station KTCI-DT: Exhibit B correctly indicates that TPT selected Channel 26 as its permanent DTV channel for Station KTCI-DT and that it will operate from a antenna site with coordinates of 45 03 29 N, 93 07 27 W with a HAAT of 396 meters. The latitude of the antenna site is incorrect; it should be 45 03 30 N, as the license for station provides.⁵ In addition, the HAAT is incorrect; it should be 393 meters, as is also shown on the station's license.

Exhibit B also indicates that Station KTCI-DT will operate with an ERP of 63.1 kW, while, as the attached license of Station KTCI-DT shows, it is currently licensed on DTV Channel 17 with an ERP of 50 kW. TPT assumes that the Commission increased Station KTCI-DT's power to 63.1 kW to compensate for the different propagation characteristics Channel 26 as compared with Channel 17. However, TPT will not be operating on Channel 26 from the same antenna height as its Channel 17 antenna. Rather, TPT has entered into an agreement with Fox Television Stations, Inc., licensee of Station KMSP-DT, which is currently operating on

⁴ After the transition, TPT plans to use the antenna currently used by Stations KMSP-DT and KTCA-DT for both Station KTCA-DT and Station KTCI-DT. The Antenna ID for that antenna is 29226.

⁵ See Exhibit 4

DTV channel 26, to use Station KMSP-DT's antenna after the transition. That antenna has a center of radiation of 413.8 meters AGL and a HAAT 411.1 meters.⁶ Since TPT requested authority to replicate the service area allocated in the original DTV Table of Allotments, TPT urges the Commission to assure that operation with an ERP of 63.1 kW at the correct HAAT will permit Station KTCI-DT to replicate that service area on Channel 26 from an HAAT of 411.1 meters. To the extent that those facilities will not permit it to replicate the original DTV service area, TPT requests that the Commission amend Exhibit B to specify the appropriate power levels to achieve that goal on Channel 26 from the antenna currently used by Station KMSP-DT.

Conclusion

Accordingly, TPT requests that the Commission correct Exhibit B to the *Seventh Further Notice* to reflect the fact that TPT plans to operate both Station KTCA-DT and Station KTCI-DT from the same antenna and to indicate that (a) Station KTCA-DT will operate on Channel 34 with an ERP of 662 kW from an HAAT of 411.1 meters and (b) Station KTCI-DT will operate on Channel 26 from a site with coordinates of 45 03 30 N, 93 07 27 W and a HAAT of 411.1 meters. In addition, TPT requests that the Commission assure that Station KTCI-DT will be able

⁶ TPT is aware that the license for Station KMSP-DT specifies a HAAT of 415 meters and that that station is using a common antenna with Station KTCA-DT. When the antenna was installed, it was installed slightly below the level originally intended and, as indicated in Station KTCA-DT's license, the center of radiation is 413.8 m AGL rather 416 m as indicated in Station KMSP-DT's license. That reduced the HAAT from 415 meter to 411.1 meters.

to replicate the service area initial authorized in the DTV Table of Allotments with digital facilities operating on DTV Channel 26 with a HAAT of 411.1 meters from the correct site.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. Frank', with a stylized flourish at the end.

Theodore D. Frank
Arnold & Porter LLP
555 Twelfth Street, N.W.
Washington, DC 20004
Counsel for Twin Cities Public Television, Inc.

January 25, 2007

EXHIBIT 1

LICENSE FOR STATION KTCA-DT

United States of America
FEDERAL COMMUNICATIONS COMMISSION
DIGITAL/TELEVISION BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

TWIN CITIES PUBLIC TELEVISION, INC.
172 EAST 4TH STREET
ST. PAUL MN 55101

Clay C. Pendarvis
Associate Chief
Video Division
Mass Bureau

Facility Id: 68594

Grant Date: August 11, 2006

This license expires 3:00 a.m.
local time, April 01, 2014.

Analog Call Sign: KTCA-TV

Digital Call Sign: KTCA-DT

Analog License File Number: BMLET-20050322AGD

Digital License File Number: BLEDT-20060802AAO

This license covers Analog Permit No.: BLET-291

This license covers Digital Permit No.: BMPEDT-20060718ACE

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

ANALOG TELEVISION ENGINEERING DATA

Callsign: KTCA-DT

License No.: BLEDT-20060802AAO

Name of Licensee: TWIN CITIES PUBLIC TELEVISION, INC.

Station Location: MN-ST. PAUL

Frequency (MHz): 54 - 60

Carrier Frequency (MHz): 55.24 Visual 59.74 Aural

Channel: 2

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Antenna type: (directional or non-directional): Non-Directional

Description: HAR, TAD-4L-3/12

Major lobe directions (degrees true): Not Applicable

Antenna Coordinates: North Latitude: 45 deg 03 min 30 sec

West Longitude: 93 deg 07 min 27 sec

Transmitter output power: 30.97 kW
14.91 DBK

Maximum effective radiated power (Peak): 100 kW
20 DBK

Height of radiation center above ground: 395.6 Meters

Height of radiation center above mean sea level: 673.2 Meters

Height of radiation center above average terrain: 393.1 Meters

Antenna structure registration number: 1022899

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

DIGITAL TELEVISION DATA

Name of Licensee: TWIN CITIES PUBLIC TELEVISION, INC.

Station Location: MN-SAINT PAUL

Frequency (MHz): 590 - 596

Channel: 34

Hours of Operation: Unlimited

Callsign: KTCA-DT

License No.: BLEDT-20060802AAO

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Antenna type: (directional or non-directional): Directional

Description: DIE, TUP-SP4-12S-1

Beam Tilt: 0.75 Degrees Electrical

Major lobe directions 305
(degrees true):

Antenna Coordinates: North Latitude: 45 deg 03 min 30 sec

West Longitude: 93 deg 07 min 27 sec

Transmitter output power: 25.3 kW
 14 DBK

Maximum effective radiated power (Average): 662 kW
 28.21 DBK

Height of radiation center above ground: 413.8 Meters

Height of radiation center above mean sea level: 690.8 Meters

Height of radiation center above average terrain: 411.1 Meters

Antenna structure registration number: 1022899

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

Special operating conditions or restrictions:

- 1 This is to notify you that your application for license is subject to the condition that on February 17, 2009, or by such other date as the Commission may establish in the future under Section 309(j)(14)(a) and (b) of the Communications Act, the licensee shall surrender either its analog or digital television channel for reallocation or reassignment pursuant to Commission regulations. The Channel retained by the licensee will be used to broadcast digital television only after this date.

*** END OF AUTHORIZATION ***

EXHIBIT 2

TPT's E-Mail Revising Its FCC Form 381



"Randy Lebedoff"
<RLebedoff@tpt.org>

11/05/2004 04:04 PM

To: <form381@fcc.gov>

cc: "Bruce Jacobs" <bjacobs@tpt.org>, Theodore
Frank/Atty/DC/ArnoldAndPorter@APORTER

Subject:

I am writing to provide some additional information with respect to the submission by Twin Cities Public Television, Inc. ("TPT") of Form 381 on behalf of its station KTCA-TV. KTCA-TV is a non-commercial television station which is licensed to operate at 924 KW, and currently operates at 350KW under an STA. It is the intention of TPT to operate the post-transition station, KTCA-DT, at 700KW. This will nearly replicate, but not fully replicate, its allotted power.

Randy M. Lebedoff
Vice President and General Counsel
Twin Cities Public Television
172 East Fourth Street
Saint Paul, MN 55101
tel. 651-229-1450
fax. 651-229-1512
e-mail rlebedoff@tpt.org

EXHIBIT 3

**Polar Plots of Station KTCA-DT's Existing DTV Antenna and
the Antenna Specified in Exhibit B**



Federal Communications Commission

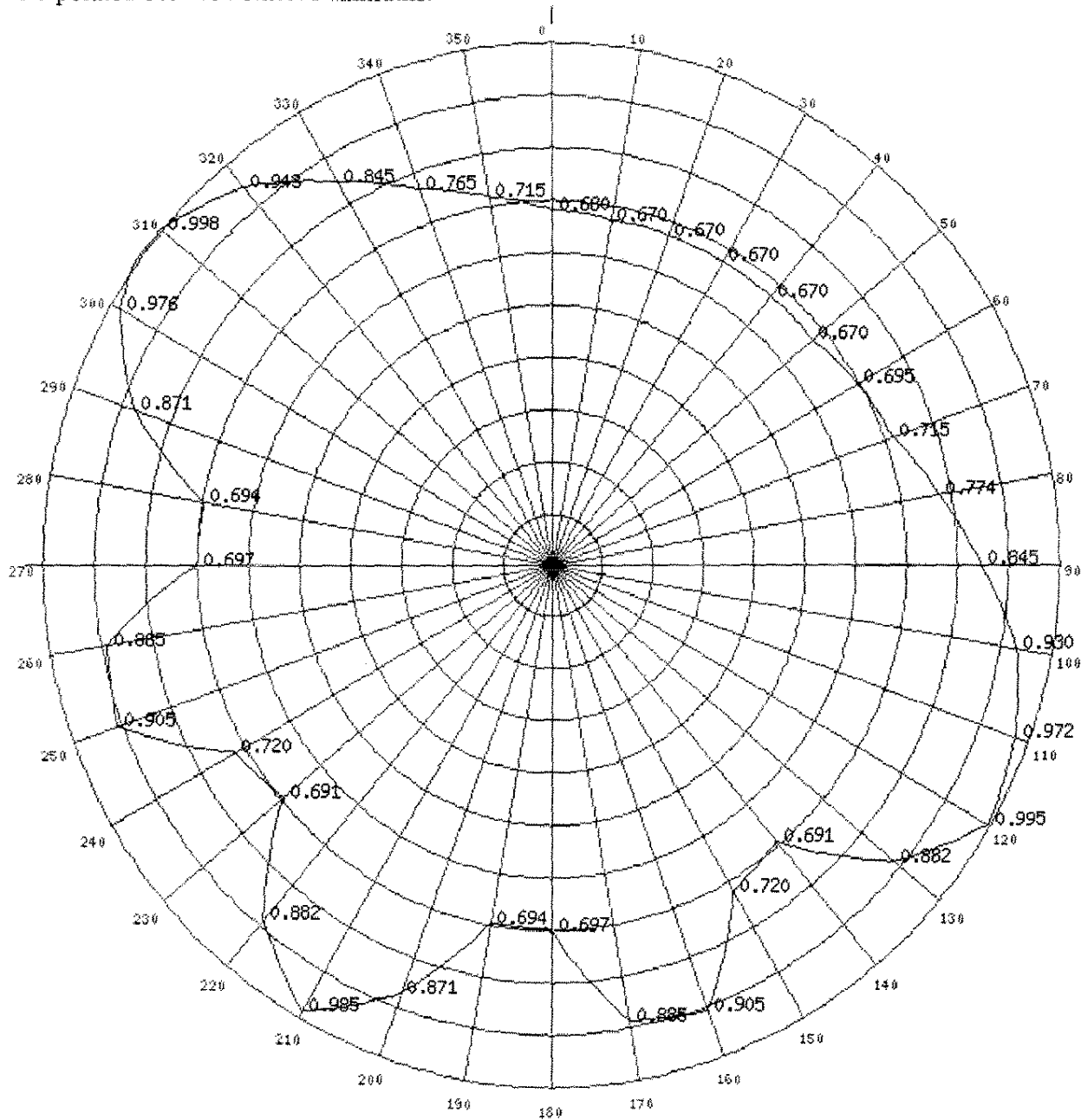
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Antenna Make		Model		Service		Antenna Id					
DIE		TUP-SP4-12S-1		DT		29226					
Antenna relative field values:											
0°	0.68	10°	0.67	20°	0.67	30°	0.67	40°	0.67	50°	0.67
60°	0.695	70°	0.715	80°	0.774	90°	0.845	100°	0.93	110°	0.972
120°	0.995	130°	0.882	140°	0.691	150°	0.72	160°	0.905	170°	0.885
180°	0.697	190°	0.694	200°	0.871	210°	0.985	220°	0.882	230°	0.691
240°	0.72	250°	0.905	260°	0.885	270°	0.697	280°	0.694	290°	0.871
300°	0.976	310°	0.998	320°	0.943	330°	0.845	340°	0.765	350°	0.715
Additional Azimuths:											
305°	1										

[Relative Field Polar Plot](#)

Any specified rotation has already been applied to the plotted pattern.

Field strength values shown on a rotated pattern may differ from the listed values because intermediate azimuths are interpolated between entered azimuths.





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Antenna Make		Model				Service		Antenna Id			
rep		MNST. PAUL 34				DT		74876			
Antenna relative field values:											
0°	0.99	10°	0.991	20°	0.992	30°	0.993	40°	0.994	50°	0.995
60°	0.996	70°	0.997	80°	0.999	90°	1	100°	0.999	110°	0.997
120°	0.996	130°	0.995	140°	0.993	150°	0.99	160°	0.988	170°	0.987
180°	0.985	190°	0.986	200°	0.986	210°	0.987	220°	0.988	230°	0.988
240°	0.988	250°	0.988	260°	0.987	270°	0.987	280°	0.988	290°	0.989
300°	0.989	310°	0.99	320°	0.99	330°	0.99	340°	0.99	350°	0.99
Additional Azimuths:											

[Relative Field Polar Plot](#)

Any specified rotation has already been applied to the plotted pattern.

Field strength values shown on a rotated pattern may differ from the listed values because intermediate azimuths are interpolated between entered azimuths.

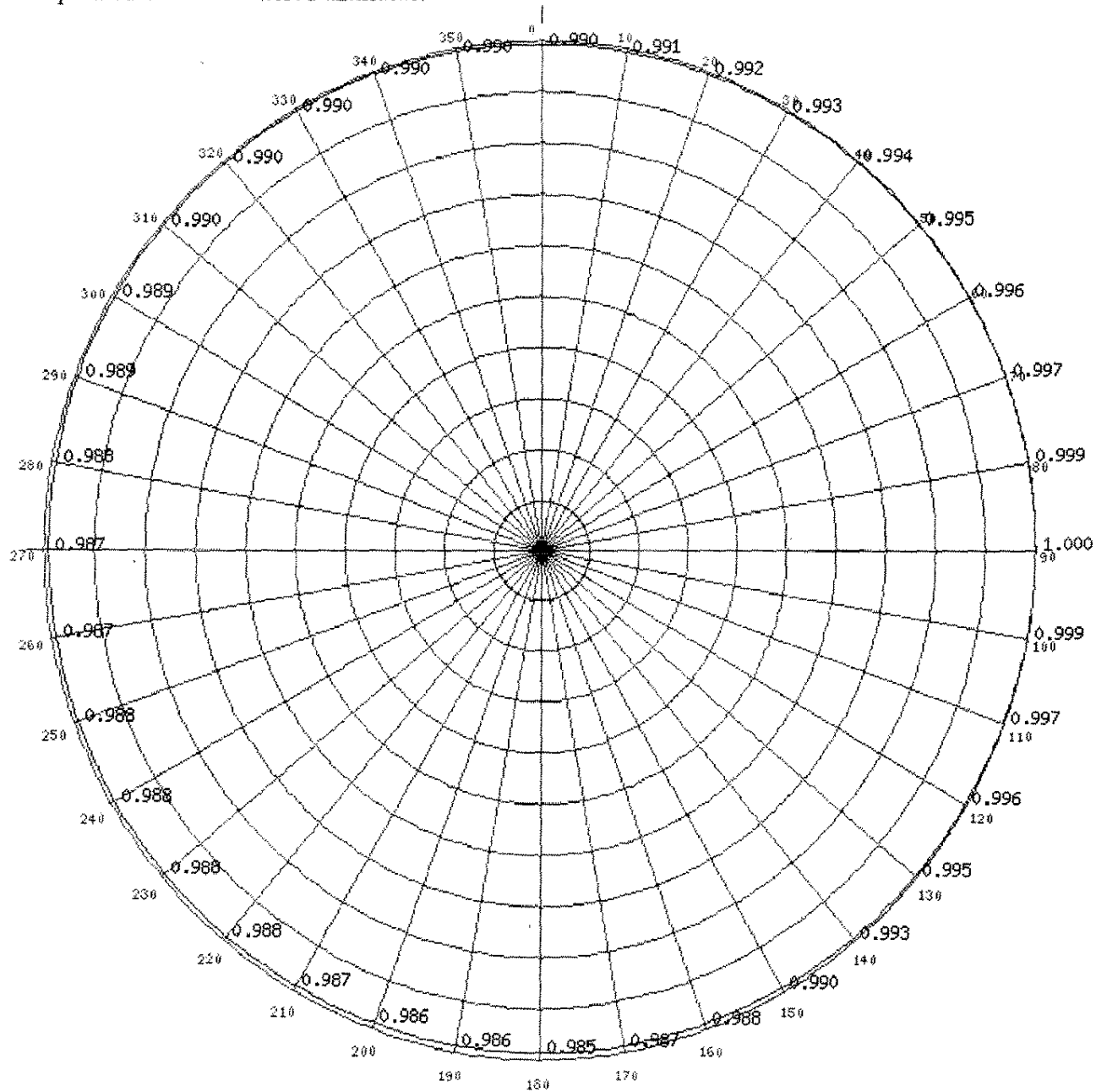


EXHIBIT 4

License for Station KTCI-DT

United States of America
FEDERAL COMMUNICATIONS COMMISSION
DIGITAL/TELEVISION BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

TWIN CITIES PUBLIC TELEVISION, INC.
172 EAST 4TH STREET
ST PAUL MN 55101

Clay C. Pendarvis
Associate Chief
Video Division
Media Bureau

Facility Id: 68597

Grant Date: January 10, 2006

This license expires 3:00 a.m.
local time, April 01, 2006.

Analog Call Sign: KTCI-TV

Digital Call Sign: KTCI-DT

Analog License File Number: BMLET-20050322AGC

Digital License File Number: BMLEDT-20050322AGB

This license covers Analog Permit No.: BLET-19910809KE

This license covers Digital Permit No.: BLEDT-19990920AAW

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

ANALOG TELEVISION ENGINEERING DATA

Callsign: KTCI-DT

License No.: BMLET-20050322AGC

Name of Licensee: TWIN CITIES PUBLIC TELEVISION, INC.

Station Location: MN-ST. PAUL

Frequency (MHz): 488 - 494

Carrier Frequency (MHz): 489.25 Visual 493.75 Aural

Channel: 17

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Antenna type: (directional or non-directional): Directional

Description: AND, ATW 30H

Beam Tilt: 1 Degrees Electrical

Major lobe directions 225
(degrees true):

Antenna Coordinates: North Latitude: 45 deg 03 min 30 sec

West Longitude: 93 deg 07 min 27 sec

Transmitter output power: 9.87 kW
9.95 DBK

Maximum effective radiated power (Peak): 331 kW
25.2 DBK

Height of radiation center above ground: 396 Meters

Height of radiation center above mean sea level: 673 Meters

Height of radiation center above average terrain: 393 Meters

Antenna structure registration number: 1022899

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

DIGITAL TELEVISION DATA

Name of Licensee: TWIN CITIES PUBLIC TELEVISION, INC.

Station Location: MN-ST. PAUL

Frequency (MHz): 482 - 488

Channel: 16

Hours of Operation: Unlimited

Callsign: KTCI-DT

License No.: BMLET-20050322AGC

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Antenna type: (directional or non-directional): Directional

Description: AND, ATW30H4-DSC3-17S, Elliptically Polarized

Beam Tilt: 1 Degrees Electrical

Major lobe directions 225
(degrees true):

Antenna Coordinates: North Latitude: 45 deg 03 min 30 sec

West Longitude: 93 deg 07 min 27 sec

Transmitter output power: 1.48 kW
 1.74 DBK

Maximum effective radiated power (Average): 50 kW
 17 DBK

Height of radiation center above ground: 395.6 Meters

Height of radiation center above mean sea level: 673 Meters

Height of radiation center above average terrain: 392.9 Meters

Antenna structure registration number: 1022899

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

*** END OF AUTHORIZATION ***